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April 5, 2021

**VIA ECF**

Honorable Stewart D. Aaron  
United States Magistrate Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Application GRANTED. SO ORDERED.  
Dated: April 5, 2021

*Att'd an*

Re: *Breland v. Commissioner of Social Security,*  
Civil Action No. 1:20-cv-05576-ER-SDA

Dear Judge Aaron,

We write on behalf of plaintiff, Cameisa Lavel Breland, and with the consent of the defendant, request a 21-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on April 5, 2021. Plaintiff respectfully requests an extension of time up to and including April 26, 2021.

This is plaintiff's second request for an extension of time. The additional time is necessary because the administrative record in this case is over 2,000 pages and our office suddenly has numerous closely scheduled (and overlapping) deadlines in social security matters. For the last several months we have received countless requests from the Agency for additional time to serve administrative records because of the delays the Agency is

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encountering in getting records prepared. We believe that the Agency is now emerging from this backlog, but it is having the unintended effect of creating a backlog on our end.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **April 26, 2021**;
- b. Defendant to serve its response/cross-motion on or before **June 25, 2021**; and
- c. Plaintiff to serve her reply (if any) on or before **July 16, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Susan Branagan, Esq. (by ECF)